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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD PAUL SEPULVEDA,
SAMUEL O. MORALES, AND
ALLEN DAVID FONG,
Defendants.

CASE NO. 2:23-CR-00271-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT
AND ~~PROPOSED~~ ORDER

STIPULATION

1. By previous order, this matter was set for status on June 6, 2025.
2. By this stipulation, the parties now move to continue the status conference until August 22, 2025, and to exclude time between June 6, 2025, and August 22, 2025, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) All parties subject to this stipulation have appeared on the Superseding Indictment. The government has produced discovery including cell phone extractions of multiple devices, social media search warrant returns, investigative reports, financial records, and other materials constituting voluminous data. This material was produced pursuant to a proposed Protective Order. Moreover, the nature of the charges contained within the

1 superseding indictment, volume of discovery, and number of defendants make the case unusual
2 and complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for
3 the trial itself within the time limits established by the Speedy Trial Act.

4 b) Counsel for defendants will require additional time to review the discovery
5 materials and charges, conduct investigation, conduct research related to the charges, to assess
6 the viability of any pretrial motions, and arrange for in-person visits to discuss potential
7 resolutions with their clients.

8 c) Counsel for defendants believe that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 d) The government also requires additional time to submit a proposed Protective
12 Order to govern the sharing and review of discovery, to produce the voluminous discovery, and
13 to coordinate the initial appearance of Defendant Alexis Rodriguez in the Eastern District of
14 California.

15 e) Based on the above-stated findings, the ends of justice served by continuing the
16 case as requested outweigh the interest of the public and the defendants in a trial within the
17 original date prescribed by the Speedy Trial Act.

18 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
19 *et seq.*, within which trial must commence, the time period of June 6, 2025 to August 22, 2025,
20 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(ii) and (iv) [Local
21 Codes T2 and T4] because it results from a continuance granted by the Court at the parties'
22 request on the basis of the Court's finding that the ends of justice served by taking such action
23 outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act warrant time periods excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 28, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ ROBERT C. ABENDROTH
ROBERT C. ABENDROTH
Assistant United States Attorney

Dated: May 28, 2025

By: /s/ Megan Taylor Hopkins
MEGAN TAYLOR HOPKINS
Counsel for Ronald Paul Sepulveda

Dated: May 28, 2025

By: /s/ Mark Joseph Reichel
MARK JOSEPH REICHEL
Counsel for Samuel O. Morales

Dated: May 28, 2025

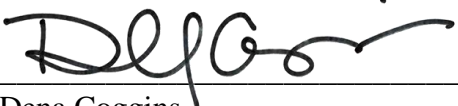
By: /s/ David Delmer Fischer
DAVID DELMER FISCHER
Counsel for Allen David Fong

ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Status Conference as to Ronald Paul Sepulveda, Samuel O. Morales, and Allen David Fong scheduled for June 6, 2025, at 9:30 a.m. is VACATED and RESET for August 22, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period between June 6, 2025 and August 22, 2025 inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii) and (iv) [Local Codes T2 and T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: May 30, 2025


Dena Coggins
United States District Judge